

Filed by: Stacey Champion

March 19, 2021

Regarding: Arizona Corporation Commission (RU-00000A-19-0132) – In the matter of Proposed Modifications to the Rules Regarding Termination of Service

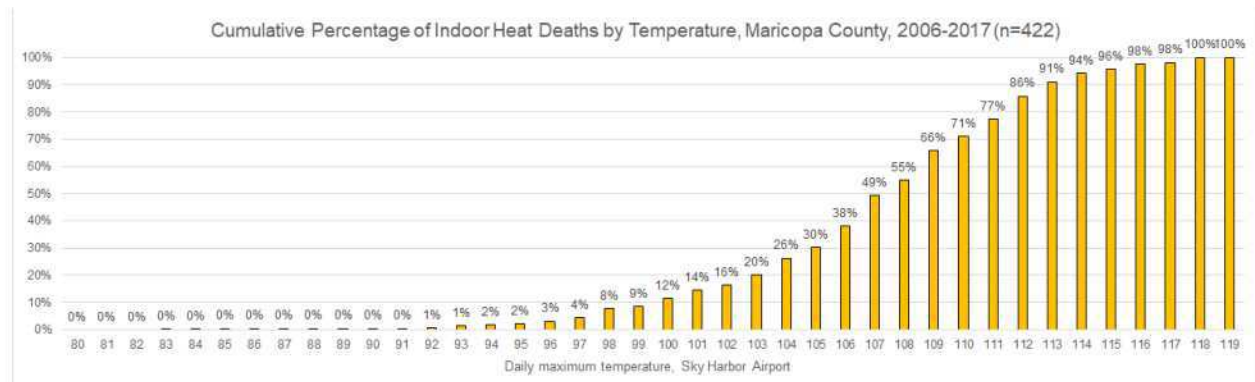
Commissioners,

First and foremost, we are here today because **people have died in their homes after their power was disconnected**, and it is **your duty to protect public health and safety**. People have also died because they turn their AC units off because they're trying to save money. I know both of these things to be true, because I've read hundreds, if not thousands of coroner reports tied to heat deaths. The reality of the situation is that what was done by utilities previously (and what SRP continues to do) - which was/is to rely on NWS heat advisories has not worked to protect life, as those advisories don't kick in here until it is extremely hot and dangerous to public health. I would also like to point out that prior to the 2019 disconnect moratorium being put in place, approximately 40% of all heat deaths in Maricopa County occurred indoors. Only in the past two years since the moratorium has been in place have we seen the percentage of indoor heat deaths drop, and what that should tell all of us, is that **the disconnect moratorium has indeed saved lives** which was its intention, post story break of Stephanie Pullman's death plus two additional families who received "settlements" from APS after people perished in their homes due to high temperatures, and countless others.

- Per the 2019 heat death report: The National Weather Service issued **10 excessive heat warnings for a total of twenty-five days in 2019**. The highest daily maximum temperature in 2019 was 115°F and occurred on July 16th and August 5th. - <https://www.maricopa.gov/ArchiveCenter/ViewFile/Item/4959>
- Per the 2018 heat death report: The National Weather Service issued **seven excessive heat warnings for a total of thirteen days in 2018**. The highest daily maximum temperature in 2018 was 116°F and occurred on July 24th and 25th. - <https://www.maricopa.gov/ArchiveCenter/ViewFile/Item/4765>
- Per the 2017 heat death report: The National Weather Service issued **four excessive heat warnings in 2017 for a total of nineteen days**. The highest daily maximum temperature in 2017 was 119°F and occurred on June 20th. - <https://www.maricopa.gov/ArchiveCenter/ViewFile/Item/3492>
- Per the 2016 heat death report: The National Weather Service issued **three excessive heat warnings in 2016 between June 1st and July 31st for a total of twelve days**. The highest daily maximum temperature of 2016 was 118°F and occurred on June 19th. - <https://www.maricopa.gov/ArchiveCenter/ViewFile/Item/3084>
- **Three excessive heat warnings were issued in 2015**. The highest daily maximum temperature this summer was 117°F and occurred on 8/14/2015. Twelve (15%) heat-associated deaths occurred during the days when an excessive heat warning was issued.

Can you as Commissioners tell me you'd all be comfortable and safe living without AC for the majority of our summer months based on the above? How about for your grandmother or sister? Your job is to regulate, and giving the utilities you regulate a "Choose your own adventure on how you'd like to kill

your customers” is not an adequate way to regulate, nor could it be easily enforced, and as RUCO rightfully pointed out, will cause confusion among ratepayers.



Here again is the data clearly showing at what temperatures people die indoors. This issue and these rules hinge on how much risk and potential liability you as the Arizona Corporation Commission are willing to carry, because as the draft rules are written, and per what utilities along with Wildfire and PIRG are suggesting, people in Arizona will continue to bake to death in their homes without clear leadership from this body. These rules should be data-driven and public health focused, or why even bother. Familiarize yourselves with the eggshell skull rule and ask yourselves how many grandmas and uncles are you willing to let die? I know that sounds harsh, but that’s the reality in this situation.

My suggestion is that we have a disconnect moratorium from May 15 – October 15 with a temperature-based threshold of 95 degrees and 32 degrees outside of the moratorium to protect as may lives as possible.

I will be filing additional (late filed) comments into this docket as well that I hope will also be read/considered prior to the March 23 open meeting on this matter.